

1 SUSAN VINEYARD  
301 East Oak Street  
2 West Frankfort, Illinois 62896  
618-932-3222 telephone  
3 618-937-2405 facsimile  
svcollect@aol.com

4  
5 **ILLINOIS COMMERCE COMMISSION**  
**SPRINGFIELD, ILLINOIS**

6 **SUSAN VINEYARD,**

7 **Complainant,**

8 **Vs.**

**Docket # 04-0094**

9 **CENTRAL ILLINOIS PUBLIC SERVICE**  
10 **COMPANY, dba AmerenCIPS.**

11 **DECLARATION OF SUSAN VINEYARD**

12 NOW COMES SUSAN VINEYARD and makes her declaration of facts and  
13 information in an attempt to rebuttal the PREPARED DIRECT TESTIMONY OF ROBIN  
HADLEY FOR CENTRAL ILLINOIS PUBLIC SERVICE COMPANY, DBA  
AMERENCIPS as follows:

- 14 1. The statements of ROBIN HADLEY are inaccurate, false and mis-leading  
and are mendacious in nature..
- 15 2. Records indicate that SUSAN VINEYARD contacted AmerenCIPS on or  
16 about May 15, 2002 to obtain energy services and spoke with ANDREA  
GRAHAM and was required to produce proof of my social security number  
and a picture ID, to which I responded immediately.
- 17 3. In addition, MS. GRAHAM informed me that my social security number was  
18 associated with three other accounts, to which I immediately objected.
- 19 4. MS. GRAHAM informed me that I must pay these associated accounts or  
20 amend my bankruptcy schedules to reflect those debts.
- 21 5. Records prove that VINEYARD amended her bankruptcy schedules to  
include the three AmerenCIPS accounts and listed the three accounts as  
22 disputed on the bankruptcy schedules.
- 23 6. VINEYARD sent the amended schedules to the United States Bankruptcy  
Court in Oakland, California and a copy of the amended schedules to  
24 AmerenCIPS in Pawnee, Illinois by UPS overnight and copies of those  
airbills were attached to the VINEYARD PREPARED DIRECT  
TESTIMONY.
- 25 7. HADLEY contends that VINEYARD'S service was disconnected in  
September 2003 because they received information that fraudulent activity  
was involved on this account.
8. It is absolutely true that I was living at 301 East Oak Street in September  
2003.

OFFICIAL FILE

04-0094  
Vineyard 2.0

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- 1 9. AmerenCIPS objected to VINEYARD knowing the identity of the informant,  
2 but on the other hand tries to paint a tainted picture of VINEYARD's  
3 integrity, by hailing this informant as important to AmerenCIPS fraud  
4 detection when in fact AmerenCIPS had approved VINEYARD'S  
5 application for energy services on or about May 15, 2002, but failed to  
6 place the service in VINEYARD'S name.
- 7 10. VINEYARD was in California for the last two weeks in August and the first  
8 three weeks of September 2003 and had her mail on hold at the local Post  
9 Office.
- 10 11. When VINEYARD returned to 301 East Oak Street, VINEYARD picked up  
11 her mail at the Post Office and declares under the penalty of perjury that  
12 there was no notice from AmerenCIPS regarding suspected fraudulent  
13 activity.
- 14 12. THERE WAS NO FRAUD AT 301 EAST Oak Street involving energy  
15 services and no notices were sent by AmerenCIPS.
- 16 13. AmerenCIPS has not produced any copy of a notice regarding fraudulent  
17 activity.
- 18 14. VINEYARD has agreed to accept all charges at 301 East Oak Street since  
19 May 15, 2002, the date in which VINEYARD applied for service and was  
20 approved.
- 21 15. It is true that AmerenCIPS billed 703 East Oak Street # D as residential  
22 service when it was non-residential.
- 23 16. The fact that AmerenCIPS mis-classified the service does not change the  
24 fact that they breached Illinois Administrative code section 280.50(c).
- 25 17. On or about April 15, 2002, MANSOR SHOKOHI was removed as Trustee  
or TOSCANO LAND TRUST.
18. On or about April 15, 2002, WESTPORT OVERSEAS, S.A.de C.V., a  
Mexican corporation was appointed successor Trustee of Toscano Land  
Trust.
19. SUSAN VINEYARD is the President of WESTPORT OVERSEAS, S.A. de  
C.V., a Mexican corporation and signed the voluntary bankruptcy petition of  
TOSCANO LAND TRUST on or about February 7, 2003 in her capacity as  
President of WESTPORT.
20. MANSOR SHOKOHI purchased 703 East Oak Street, which is 3  
apartments that are known as Units A, B & C, on or about June 30, 1995.  
Unit D was established on August 9, 1995 as the house meter for common  
areas where electricity was needed.
21. Apparently, from the records produced by AmerenCIPS, the monthly bills  
were in the neighborhood of \$ 15.00 to \$16.00 per month. That appears to  
be approximately 215 consecutive months that AmerenCIPS allowed  
electric services to be provided to 703 East Oak # D without ever contacting  
SUSAN VINEYARD. If they believed she was the responsible party.
22. According to Exhibit "I", they had the correct telephone number of 618-932-  
3222 for SUSAN VINEYARD.
23. On Page 10, line items 181 to 209, AmerenCIPS claims that SUSAN  
VINEYARD and SANGIOVESE LAND TRUST opened the energy services  
account at 301 East Oak Street on December 12, 1991.
24. In February 1998, the formation of SANGIOVESE LAND TRUST was  
25 contemplated. SLT did not exist in 1991. SLT was never formed as an  
Illinois Land Trust.

- 1 25. Exhibit "L" is a copy of a Direct Deposit Form in the name of S & V  
2 PROPERTY MNAGEMENT COMPANY, INC., authorizing CIPS to take  
3 money from SANGIOVESE LAND TRUST account at First Bank, and is  
4 signed by BARBARA WILLIAMS.
- 5 26. There is no S & V PROPERTY MANAGEMENT COMPANY, INC. SUSAN  
6 VINEYARD was a partner with MANSOR SHOKOHI in S & V PROPERTY  
7 MANAGEMENT COMPANY, an Illinois general partnership.
- 8 27. BARBARA WILLIAMS did not have signatory authority on any bank account  
9 of SUSAN VINEYARD or MANSOR SHOKOHI and certainly was not  
10 authorized to sign any direct debit forms.
- 11 28. BARBARA WILLIAMS was my house keeper, had keys to my house and  
12 knowledge of my social security number and that of MANSOR SHOKOHI.
- 13 29. This is just another example how CIPS does not verify who has authority to  
14 open accounts or sign direct debit forms.
- 15 30. On page 12, AmerenCIPS states that Christine Susan Vineyard opened a  
16 residential service account on April 2, 2001. That is impossible, because  
17 SUSAN VINEYARD was living at 486 Vasser Avenue in Berkeley  
18 California at that time. See AmerenCIPS Exhibit "M" and answer to  
19 Question 5.
- 20 31. On page 12, lines 235 to 238, AmerenCIPS accuses SUSAN VINEYARD  
21 of using various social security numbers and permutations of her name to  
22 obtain electrical service from AmerenCIPS. This is false and AmerenCIPS  
23 has not produced one document that can stand behind their allegations.

### 24 SUMMARY

- 25 32. AmerenCIPS violated Illinois Administrative Code Section 280.50 c) by mis-  
classifying the electrical service at 703 #D East Oak Street as residential  
when it is clearly non-residential and can not be transferred to the  
residential account of SUSAN VINEYARD at 301 East Oak Street.
33. AmerenCIPS violated Illinois Administrative Code Section 280.50 d) when it  
failed to get proper identification from TOSCANO LAND TRUST,  
SANGIOVESE LAND TRUST, CATHERINE S VINEYARD and CHRISTINE  
S VINEYARD or my authority for these entities and individuals to obtain  
energy services.
34. SUSAN VINEYARD has agreed to accept the energy services bill of  
CATHERINE S VINEYARD from May 15, 2002 until the change of services  
into the name of SUSAN VINEYARD in September, 2003, which was \$  
662.00 less the payment of \$ 121.00 to restore the improperly disconnected  
service. I admit that I used energy services in the name of CATHERINE S  
VINEYARD from May 15, 2002 to September 2003, notwithstanding that I  
had provided proper identification, amended my bankruptcy schedule per  
AmerenCIPS employee ANDREA GRAHAM and had been approved for  
energy services in my name—SUSAN VINEYARD, NOTWITHSTANDING  
AmerenCIPS failure to transfer the services.

I declare under the penalty of perjury that the foregoing statements are true and  
accurate and can testify if called as a witness to do so.

SUSAN VINEYARD  
September 14, 2004

Ameren.robinhadley.sv.doc